

# EXHIBIT 2

**From:** [Goldman, Rachel](#)  
**To:** [Hill, Jennifer \(SHB\)](#); [Geoffrey Spaulding](#); [Cox, Christopher](#); [Jacobs, Andrew](#); [Jones, Barbara](#); [Kokalas, Tom](#); [Connolly, Daniel](#); [Cummings, Dan \(SHB\)](#); [Cole, Brandon J. \(SHB\)](#); [Lean, Amanda M. \(SHB\)](#); [Potter, Erich C. \(SHB\)](#); [Gromada, Veronica G. \(SHB\)](#); [Salcedo, Maria \(SHB\)](#); [Uber-DefensePrivilegeTeam](#); [St. Amand, Amy](#); [Ball, David](#)  
**Cc:** [Roopal Luhana](#); [Sarah London](#); [Rachel Abrams](#); [Steven Cohn](#); [Tiffany Ellis](#); [Uber MDL Privilege Log Team](#)  
**Subject:** RE: Plaintiffs' disputed entries regarding Defendants' August 8, 2025 and August 11, 2025 clawback notices  
**Date:** Sunday, August 24, 2025 4:59:27 PM  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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On behalf of Judge Jones, please see below.

Dear Counsel,

Thank you for your submissions. After considering the document at issue, the declaration from Uber's counsel Jennifer Handley, and the parties' positions, defendants may withhold this document as subject to the work product protection.

Barbara Jones

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**RACHEL GOLDMAN**

Partner

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**From:** Hill, Jennifer (SHB) <JSHILL@SHB.COM>

**Sent:** Saturday, August 23, 2025 12:57 PM

**To:** Goldman, Rachel <rachel.goldman@bracewell.com>; Geoffrey Spaulding <spaulding@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>; Jacobs, Andrew <andrew.jacobs@bracewell.com>; Jones, Barbara <barbara.jones@bracewell.com>; Kokalas, Tom

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**Subject:** [EXTERNAL] RE: Plaintiffs' disputed entries regarding Defendants' August 8, 2025 and August 11, 2025 clawback notices

Dear Ms. Goldman and Judge Jones,

Please see the attached correspondence, along with a declaration from Jennifer Handley, regarding Plaintiffs' challenge to JCCP\_MDL\_PRIVLOG110284. This document has been made available on the Special Master's Relativity review space.

If the Special Master's team has any questions, please let us know.

Thank you.

**Jennifer Stonecipher Hill**

*Partner*

Shook, Hardy & Bacon L.L.P.

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**From:** Goldman, Rachel <[rachel.goldman@bracewell.com](mailto:rachel.goldman@bracewell.com)>

**Sent:** Friday, August 22, 2025 4:39 PM

**To:** Geoffrey Spaulding <[spaulding@chaffinluhana.com](mailto:spaulding@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Jacobs, Andrew <[andrew.jacobs@bracewell.com](mailto:andrew.jacobs@bracewell.com)>; Jones, Barbara <[barbara.jones@bracewell.com](mailto:barbara.jones@bracewell.com)>; Kokalas, Tom <[thomas.kokalas@bracewell.com](mailto:thomas.kokalas@bracewell.com)>; Connolly, Daniel <[daniel.connolly@bracewell.com](mailto:daniel.connolly@bracewell.com)>; Cummings, Dan (SHB) <[decummings@shb.com](mailto:decummings@shb.com)>; Cole, Brandon J. (SHB) <[bcole@shb.com](mailto:bcole@shb.com)>; Lean, Amanda M. (SHB) <[alean@shb.com](mailto:alean@shb.com)>; Potter, Erich C. (SHB) <[epotter@shb.com](mailto:epotter@shb.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Hill, Jennifer (SHB) <[JSHILL@SHB.COM](mailto:JSHILL@SHB.COM)>; Salcedo, Maria (SHB) <[msalcedo@shb.com](mailto:msalcedo@shb.com)>; Uber-DefensePrivilegeTeam <[uber-defenseprivilegeteam@shb.com](mailto:uber-defenseprivilegeteam@shb.com)>; Amy St. Amand <[amy.stamand@kirkland.com](mailto:amy.stamand@kirkland.com)>; Ball, David <[david.ball@bracewell.com](mailto:david.ball@bracewell.com)>

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**Subject:** RE: Plaintiffs' disputed entries regarding Defendants' August 8, 2025 and August 11, 2025 clawback notices

**EXTERNAL**

Thank you Mr. Spaulding.

Counsel for defendants, please provide your response to Judge Jones by 12 noon PT tomorrow, August 23, 2025, regarding the document for which plaintiffs have requested expedited review.

Additionally, please provide the document at issue as soon as possible.

Thank you,  
Rachel Goldman

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**From:** Geoffrey Spaulding <[spaulding@chaffinluhana.com](mailto:spaulding@chaffinluhana.com)>

**Sent:** Friday, August 22, 2025 5:08 PM

**To:** Goldman, Rachel <[rachel.goldman@bracewell.com](mailto:rachel.goldman@bracewell.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Jacobs, Andrew <[andrew.jacobs@bracewell.com](mailto:andrew.jacobs@bracewell.com)>; Jones, Barbara <[barbara.jones@bracewell.com](mailto:barbara.jones@bracewell.com)>; Kokalas, Tom <[thomas.kokalas@bracewell.com](mailto:thomas.kokalas@bracewell.com)>; Connolly, Daniel <[daniel.connolly@bracewell.com](mailto:daniel.connolly@bracewell.com)>; Cummings, Dan (SHB) <[decummings@shb.com](mailto:decummings@shb.com)>; Cole, Brandon J. (SHB) <[bcole@shb.com](mailto:bcole@shb.com)>; Lean, Amanda M. (SHB) <[alean@shb.com](mailto:alean@shb.com)>; Potter, Erich C. (SHB) <[epotter@shb.com](mailto:epotter@shb.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Jennifer (SHB) <[JSHILL@SHB.COM](mailto:JSHILL@SHB.COM)>; Salcedo, Maria (SHB) <[msalcedo@shb.com](mailto:msalcedo@shb.com)>; Uber-DefensePrivilegeTeam <[uber-defenseprivilegeteam@shb.com](mailto:uber-defenseprivilegeteam@shb.com)>; Amy St. Amand <[amy.stamand@kirkland.com](mailto:amy.stamand@kirkland.com)>; Ball, David <[david.ball@bracewell.com](mailto:david.ball@bracewell.com)>

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**Subject:** [EXTERNAL] Plaintiffs' disputed entries regarding Defendants' August 8, 2025 and August 11, 2025 clawback notices

Dear Judge Jones,

Attached please find three entries for which Uber has issued clawback notifications that Plaintiffs continue to challenge. The Parties met on August 20, 2025. During that meeting, counsel for Uber indicated they might reconsider their position on two of the entries but needed to confer with their client. To date, Defendants have not provided any update, and accordingly, Plaintiffs maintain their challenges to all three entries.

In addition, Plaintiffs respectfully request expedited review of document UBER\_JCCP\_MDL\_003028890 (JCCP\_MDL\_PRIVLOG110284) for use in a deposition on Monday. Plaintiffs assert that this document was clawed back on August 11, 2025 in response to its public description in the August 7, 2025 New York Times article "Uber's Festering Sexual Assault Problem." This document was originally produced to Plaintiffs as early as February 2025. In addition, the document already has redactions on its face for personal identifying information. Altogether, these facts suggest that not only was Uber aware that it had produced this document to Plaintiffs in spite of "at the direction of counsel" language on its face, but that it redacted the document as it saw appropriate. Given the date of production, this document was also subject to numerous court directives (orders) under Judge Cisneros that Uber re-review all documents. Whether Uber failed to do so, or simply now regrets its earlier decision not to clawback the document, its belated claims are now waived under the Courts' orders.

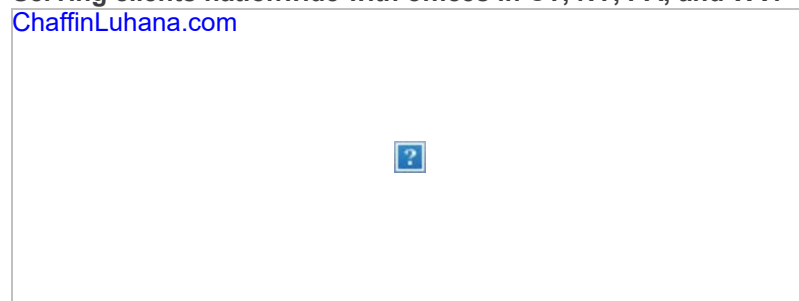
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